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USWEST

EX PARTE OR LATE FILED

Robert H. Jackson
Executive Director-
Federal Regulatory

Ex Parte

January 16, 1997

RECEIVED

JAN 16 1997

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222, SC-1170
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

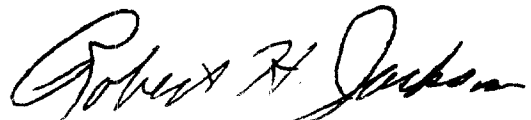
Re: CC Docket No. 95-116, *Telephone Number Portability*

Dear Mr. Caton:

Today, Ken Ackerman, Jeff Mitchell and the undersigned on behalf of U S WEST met with Chris Barnekov, Lloyd Colling, Neil Fried, Linda Kinney, Carol Matthey, Susan McMaster, Lenworth Smith, Don Stockdale, Jeannie Su and Steven Teplitz of the Common Carrier Bureau on the above-captioned proceeding. We discussed U S WEST Communications' current views on the network and systems modifications necessary to implement number portability. Also, we discussed the costs associated with these modifications. The attached handout was left with the Commission. Please include a copy of this letter and the attachment in the record in this docket.

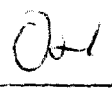
Acknowledgment and date of receipt of this letter are requested. A duplicate letter is attached for this purpose.

Sincerely,



cc: Chris Barnekov
Lloyd Colling
Neil Fried
Linda Kinney
Carol Matthey
Susan McMaster
Lenworth Smith
Don Stockdale
Jeannie Su
Steven Teplitz

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CC Docket No. 95-116
Telephone Number Portability

**Summary of Infrastructure & System Requirements
to Deploy Long-Term Number Portability**

U S WEST Communications

January 16, 1997

Agenda

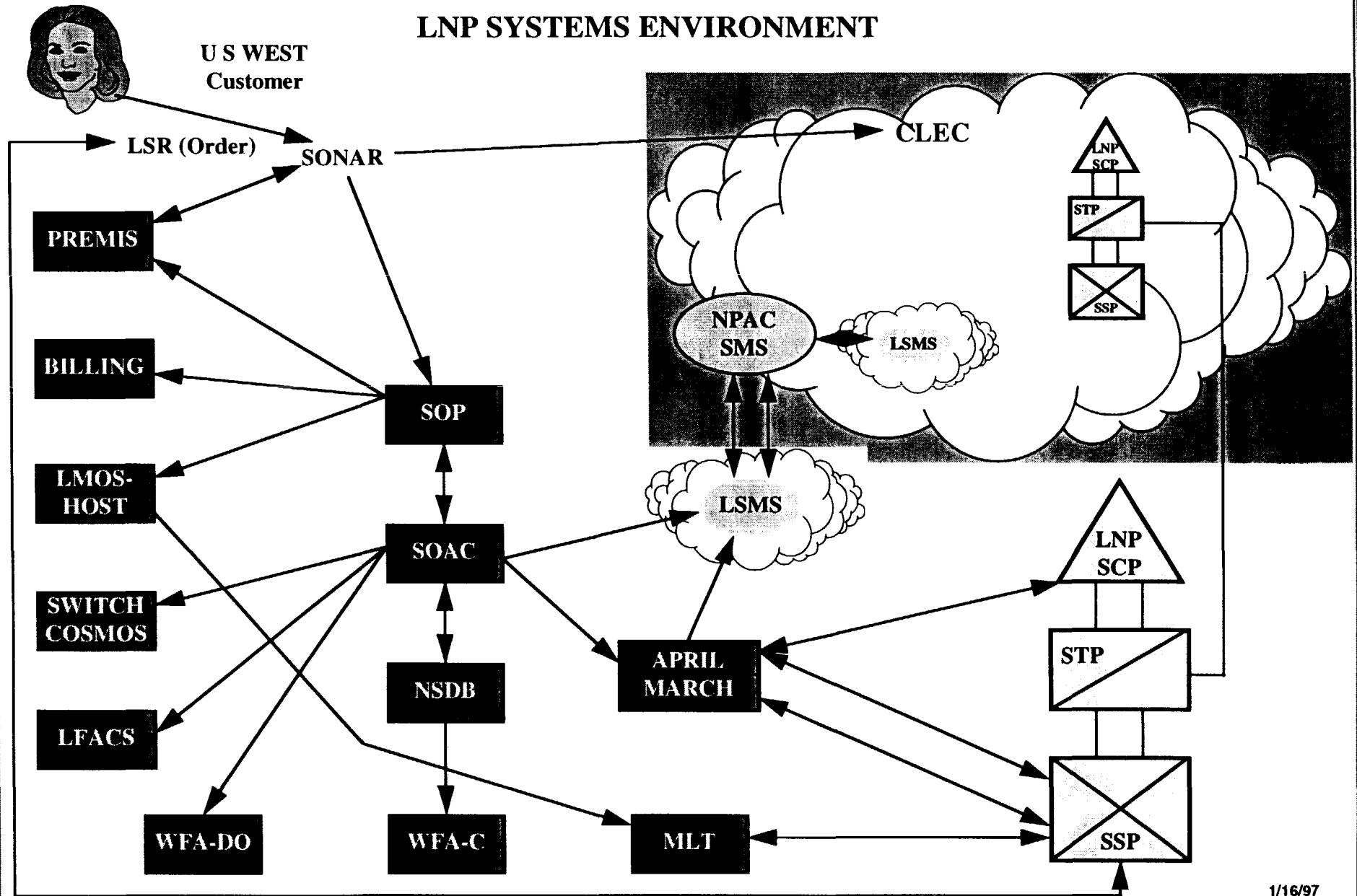
- **Network Topology**
- **Systems Overview**
- **Switching Requirements**
- **Signaling Requirements**
- **Cost Summary**
- **Conclusion**

U S WEST LATA & AREA CODE MAP

North

- Proprietary -
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except under written agreement and approval from
H.A. Plummer, Vice President - Capacity Provisioning

LNP SYSTEMS ENVIRONMENT



LNP Switch Required

	1AESS upgrade	1AESS replace
Minneapolis-St Paul	14	2
Phoenix-Mesa	12	4
Seattle-Bellevue-Everett	8	2
Denver	11	5
Portland-Vancouver	6	0
Salt Lake City	6	1
Tucson	4	2
Omaha	2	0
Albuquerque	2	0
Tacoma	3	0
other	27	2
MSA TOTAL	68	16
Grand Total	95	18

- Nearly 900 switching entities will need to re-upgrades (or replacement) over the 5 year
- The above summary does not include any of the entities to negotiations with individual State PUCs identified in the 5 year plan.

LNP Signaling Requirements Summary

	Current Links	LRN Link Additions	STP CPU Upgrades each	STP port additions	ISCP pair
Minneapolis-St Paul	186	186	2	246	1
Phoenix-Mesa	204	92	3	104	1
Seattle-Bellevue-Everett	162	78	2	88	1
Denver	214	90	4	102	1
Portland-Vancouver	142	88	2	100	1
Salt Lake City	104	46		82	
Tucson	70	16		32	
Omaha	96	28		48	
Albuquerque	92	42		78	
Tacoma	42	20		22	
other	834	138		258	
MSA TOTAL	1,312	686	13	902	5
Grand Total	2,146	824	13	1,160	5

- Represents a nearly 40% increase in SS7 link network.
- Requires STP processor upgrades at 6 regional locations.
- Additional STP port requirements for links and SCP terminations.
- Five new SCP pairs needed to perform LNP database function.

LNP Budget Review - Top 10 MSA Network/System Modification (\$Millions)

NETWORK MODIFICATIONS (Millions \$)	Prior Filing	Current Estimate	SYSTEM MODIFICATIONS (Millions \$)	Prior Filing	Current Estimate	TOTALS	Prior Filing	Current Estimate
Capital Costs-			Capital Costs-					
Network Reliability Center:	\$ 3.2	\$ 1.8	Local Service Management:	\$ 7.4	\$ 16.0			
SS7 Equipment:	\$ 63.0	\$ 55.0	Billing:	\$ 0.4	\$ 2.0			
Switching Equipment:	\$ 138.7	\$ 79.2	Service Delivery:	\$ -	\$ -			
AMA Software:	\$ 0.6	\$ -	Service Assurance:	\$ 3.6	\$ 2.6			
LRN:	\$ 20.0	\$ 29.1	Miscellaneous:	\$ 0.1	\$ 1.3			
AIN Software:	\$ 0.3	\$ 0.4	Provisioning:		\$ 2.3			
SS7 Software:	\$ 16.8	\$ 3.6						
Subtotal-	\$ 242.6	\$ 169.1	Subtotal-	\$ 11.5	\$ 24.2	TOTAL CAPITAL	\$ 254.1	\$ 193.3
Expenses-			Expenses-					
Network Reliability Center:	\$ 2.9	\$ 0.2	Local Service Management:	\$ 5.8	\$ 11.0			
SS7 Equipment:	\$ 55.9	\$ 36.7	Billing:	\$ 1.7	\$ 1.7			
Generics:	\$ 13.5	\$ 17.2	Service Delivery:	\$ 0.1	\$ 2.4			
Switch Modifications:	\$ 14.0	\$ 10.6	Service Assurance:	\$ 5.4	\$ 8.6			
LRN Software:	\$ 4.5	\$ 5.1	Capacity Provisioning:	\$ 3.3	\$ -			
AMA Software:	\$ 0.3	\$ -	Miscellaneous:	\$ 3.4	\$ 3.4			
Other:	\$ 0.4	\$ -	Provisioning:	\$ -	\$ 20.4			
Subtotal-	\$ 91.5	\$ 69.8	Subtotal-	\$ 19.7	\$ 47.5	TOTAL EXPENSE	\$ 111.2	\$ 117.3
TOTAL-	\$ 334.1	\$ 238.9	TOTAL-	\$ 31.2	\$ 71.7	GRAND TOTAL-	\$ 365.3	\$ 310.6

Note: Above numbers are current planning estimates and are subject to change
 as additional requirements and final costs are determined.

LNP Budget Review - 5 Year View Network/System Modification (\$Millions)

NETWORK MODIFICATIONS (Millions \$)	Prior Filing	Current Estimate	SYSTEM MODIFICATIONS (Millions \$)	Prior Filing	Current Estimate	TOTALS	Prior Filing	Current Estimate
Capital Costs-			Capital Costs-					
Network Reliability Center:	\$ 3.2	\$ 1.8	Local Service Management:	\$ 7.4	\$ 16.0			
SS7 Equipment:	\$ 63.1	\$ 57.0	Billing:	\$ 0.4	\$ 2.0			
Switching Equipment:	\$ 170.0	\$ 105.9	Service Delivery:	\$ 0.1	\$ 0.0			
AMA Software:	\$ 0.9	\$ -	Service Assurance:	\$ 3.6	\$ 2.6			
LRN:	\$ 42.9	\$ 62.1	Miscellaneous:	\$ 0.1	\$ 1.3			
AIN Software:	\$ 0.6	\$ 0.6	Provisioning:	\$ -	\$ 2.3			
SS7 Software:	\$ 19.0	\$ 4.5						
Subtotal-	\$ 299.7	\$ 231.9	Subtotal-	\$ 11.6	\$ 24.2	TOTAL CAPITAL-	\$ 311.3	\$ 256.1
Expenses-			Expenses-					
Network Reliability Center:	\$ 2.9	\$ 0.2	Local Service Management:	\$ 5.8	\$ 11.0			
SS7 Equipment:	\$ 147.9	\$ 45.9	Billing:	\$ 1.7	\$ 1.7			
Generics:	\$ 27.4	\$ 29.8	Service Delivery:	\$ 0.1	\$ 2.4			
Switch Modifications:	\$ 28.0	\$ 17.2	Service Assurance:	\$ 5.4	\$ 8.6			
LRN Software:	\$ 4.2	\$ 10.0	Capacity Provisioning:	\$ 3.3	\$ -			
AMA Software:	\$ 0.4	\$ -	Miscellaneous:	\$ 3.4	\$ 3.4			
Other:	\$ 0.8	\$ -	Provsioning:	\$ -	\$ 20.4			
Subtotal-	\$ 211.6	\$ 103.1	Subtotal-	\$ 19.7	\$ 47.5	TOTAL EXPENSE-	\$ 231.3	\$ 150.6
TOTAL-	\$ 511.3	\$ 335.0	TOTAL-	\$ 31.3	\$ 71.7	GRAND TOTAL-	\$ 542.6	\$ 406.7

Note: Above numbers are current planning estimates and are subject to change
 as additional requirements and final costs are determined.

Conclusion

- USWC is committed to MSA schedule but remains concerned about magnitude and complexity of LNP requirements.
- Cost impacts have been refined as more information and detail has been made available.
- We are working closely with Bellcore and others to insure all requirements are understood and addressed.
- Actual contract negotiations are underway with suppliers to obtain firm quotes and delivery schedules.
- USWC will use only incurred costs to determine actual cost recovery requirements.
- USWC has a well defined plan addressing known requirements associated with Long Term Number Portability.
- USWC is concerned that it has begun incurring number portability costs without being assured of cost recovery as contemplated by §251 of the Telecommunications Act of 1996.